

## **EXHIBIT 3**

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5 Attorneys for Defendant  
JBC LEGAL GROUP AND JACK BOYAJIAN

6 UNITED STATES DISTRICT COURT

7 NORTHERN DISTRICT OF CALIFORNIA - SAN JOSE DIVISION

8 RAYMOND ABELS, on behalf of himself and all  
9 others similarly situated,

10 Plaintiff,

11 v

12 JBC LEGAL GROUP, P.C., a Corporation and  
13 JACK BOYAJIAN, an Individual,

14 Defendants

Case No.: C04 02345 RS

DEFENDANTS JBC LEGAL GROUP AND  
JBC & ASSOCIATES' RESPONSE TO  
PLAINTIFF'S FIRST SET OF  
INTERROGATORIES

15 PROPOUNDING PARTY: PLAINTIFF RAYMOND ABELS

16 RESPONDING PARTY: DEFENDANT JBC LEGAL GROUP AND JBC & ASSOCIATES

17 SET NUMBER: ONE

18  
19 It should be noted that this responding party has not fully completed its investigation of the  
20 facts relating to this case, has not fully completed its discovery in this action, and has not completed its  
21 preparation for the trial. All the answers contained herein are based upon such information and  
22 documents which are presently available and specifically known to this responding party and disclose  
23 only those contentions which presently occur to such responding party. It is anticipated that further  
24 discovery, independent investigation, legal research and analysis will supply additional facts, add  
25 meaning to the known facts, as well as establish entirely new factual conclusions and legal contentions,  
26 all of which may lead to substantial additions, changes in and variations from the contentions herein  
27 set forth. The following interrogatory responses are given without prejudice to responding party's right  
28

December 31, 2003, JBC Legal Group's balance sheet indicated that assets minus liabilities equaled approximately \$113,334.08. JBC Legal Group's 2003 tax records indicated that assets minus liabilities equaled approximately \$112,865.

**INTERROGATORY NO. 6:**

State the net worth of Defendant Jack Boyajian and how it was calculated.

**RESPONSE TO INTERROGATORY NO. 6:**

Objection. This interrogatory is compound. This interrogatory seeks information that is not likely to lead to the discovery of admissible evidence, especially given the procedural posture of this individual claim. This interrogatory is vague and ambiguous. This interrogatory seeks confidential and private information that violates responding party's rights of privacy as provided for under the federal Constitution and its laws, as well as the California constitution. Notwithstanding these objections, and without waiving these objections, responding party responds as follows: Jack Boyajian's only appreciable asset is JBC Legal Group, and the net worth of JBC Legal Group is greatly outweighed by Mr. Boyajian's liabilities, which are in the six-figure range. Therefore, Mr. Boyajian has a negative net worth.

**INTERROGATORY NO. 7:**

State the amounts recovered by Defendants through use of Exhibits A or B.

**RESPONSE TO INTERROGATORY NO. 7:**

Objection. This interrogatory is compound. This interrogatory seeks information that is not likely to lead to the discovery of admissible evidence, especially given the procedural posture of this individual claim. This interrogatory is vague and ambiguous. This interrogatory seeks confidential and private information that violates responding party's rights of privacy as provided for under the federal Constitution and its laws, as well as the California constitution.

**INTERROGATORY NO. 8:**

State the caption of each lawsuit filed against JBC or Jack Boyajian with regard to letters in the form of Exhibits A or B.

**INTERROGATORY NO. 18:**

State the name and location of the person(s) who created, authorized the use, and directed the mailings of Exhibits A and B.

**RESPONSE TO INTERROGATORY NO 18:**

Objection This interrogatory is vague and ambiguous and compound. This interrogatory invades the attorney work product doctrine. Notwithstanding these objections and without waiving these objections, responding party responds as follows: Jack Boyajian drafted the letters attached as Exhibits A and B, and directed the mailing of these two letters.

**INTERROGATORY NO. 19:**

Describe the responsibilities and duties of Jack Boyajian with JBC

**RESPONSE TO INTERROGATORY NO 19:**

Objection. Responding party objects because this interrogatory is vague and ambiguous. Responding party objects because the requested information is not likely to lead to the discovery of admissible evidence as delineated by the allegations in the operative complaint. Furthermore, responding party objects because the information sought is privileged as attorney work product. This request also seeks the disclosure of confidential trade secrets contained within the documents which if disclosed would negatively impact the financial status of responding party. Notwithstanding these objections, and without waiving these objections, responding party responds as follows: Mr. Boyajian oversees and manages the legal collection process, strategy, and procedures. He also overviews all incoming accounts in California and he is the attorney who manages and is responsible for all California related work in the firm.

**INTERROGATORY NO. 20:**

Describe the distribution of any moneys paid to Defendants as a result of letters in the form of Exhibits A and B.

**RESPONSE TO INTERROGATORY NO 20:**

Objection This interrogatory is compound. This interrogatory seeks information that is not likely to lead to the discovery of admissible evidence, especially given the procedural posture of this individual claim. This interrogatory is vague and ambiguous. This interrogatory seeks confidential

1 and private information that violates responding party's rights of privacy as provided for under the  
2 federal Constitution and its laws, as well as the California constitution.

3 **INTERROGATORY NO. 21:**

4 Describe the relationship between JBC Legal Group, P.C. and JBC & Associates, Inc.

5 **RESPONSE TO INTERROGATORY NO 21:**

6 Objection. This interrogatory is vague and ambiguous. This interrogatory also appears to seek  
7 a legal conclusion. This interrogatory is not likely to lead to the discovery of admissible evidence as  
8 framed by the operative complaint. Notwithstanding this objection, and without waiving this  
9 objection, responding party responds as follows: There is no relationship between these two  
10 companies.

11 **INTERROGATORY NO. 22:**

12 Describe the relationship between JBC Legal Group, P.C. and Jack Boyajian.

13 **RESPONSE TO INTERROGATORY NO 22:**

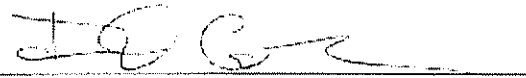
14 Objection. This interrogatory is vague and ambiguous. This interrogatory also appears to seek  
15 a legal conclusion. This interrogatory is not likely to lead to the discovery of admissible evidence as  
16 framed by the operative complaint. Notwithstanding this objection, and without waiving this  
17 objection, responding party responds as follows: Jack Boyajian is the President of JBC Legal Group.

18 Dated: December 20, 2004

19 AS TO OBJECTIONS ONLY:

20 MURPHY, PEARSON, BRADLEY & FEENEY

21  
22 By

  
June D. Coleman  
Attorneys for Defendant  
JBC LEGAL GROUP AND JACK BOYAJIAN

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